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April 17, 2023

**VIA ECF**

Hon. Paul G. Gardephe  
US District Court Judge  
Southern District of New York  
40 Centre Street  
New York, New York 10007-1312

**Re: USA v. James Zhong, 22 Cr. 606-001 (PGG)**

Dear Judge Gardephe:

We respectfully request that Your Honor recommend to the Bureau of Prisons that Mr. Zhong be incarcerated in FPC Montgomery, Alabama.

Respectfully,

/s/ *Michael Bachner*

Michael F. Bachner

Cc: Government counsel (via ECF and email)